



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

David Grede
EH&S Manager
Garratt-Callahan Company
50 Ingold Road
Burlingame, CA 94010

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

DEC 17 2010

Subject: Formula 35
EPA Registration No.8540-13
Amendment Date: Sept 09, 2010
EPA Receipt Date: Sept 20, 2010

Dear Mr. David Grede

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable with comments for the following reasons.

Proposed Amendment

Adding New Label Comments

Major Deficiencies

2) Revise the Directions for Use section to clearly define the dosage rates and methods of application when using this produce, so that it is clear to the user. You can find the guidance for these revisions to the label in the Agency's FAD-1 under labeling for Directions for Use instructions.

Other Deficiencies

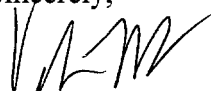
1) In the section labeled Environmental Hazards revise this section by deleting the second sentence which begins with "Do not apply (or use).....surface water"

General Comments

A stamped copy of the labeling is enclosed. Submit one(1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Velma Noble at (703) 308-6233

Sincerely,



Velma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510P)



Main Office: 50 Ingold Road, Burlingame, CA 94010 (650) 697-5811 FAX (650) 692-6098

Plants: Addison, IL Atlanta, GA Edison, NJ Dallas, TX Burlingame, CA

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

STORAGE AND DISPOSAL

FORMULA 35

TWIN-CHAIN QUATERNARY AMMONIUM COMPOUND CONCENTRATE WATER TREATMENT MICROBIOCIDES FOR BUILDING AND RECIRCULATING COOLING TOWERS.

ACTIVE INGREDIENTS:

DIDECYL DIMETHYL AMMONIUM CHLORIDE	25.0%
INERT INGREDIENTS	75.0%
TOTAL	100.0%

**KEEP OUT OF REACH OF CHILDREN
DANGER**

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
IF INHALED	<ul style="list-style-type: none"> Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
<p>HOT LINE NUMBER You may contact the Poison Center at 1-800-222-1222 for emergency medical treatment information.</p> <p>Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment. You may also call 1-303-623-5716 day or night for emergency medical treatment information.</p> <p>NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.</p>	

DANGER, KEEP OUT OF REACH OF CHILDREN. Corrosive, causes irreversible eye damage and skin burns. Harmful if swallowed or inhaled. Do not get in eyes, on skin, or on clothing, wear appropriate protective eyewear such as goggles, face shield, or safety glasses, protective clothing and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, aquatic invertebrates, oyster, and shrimp. Do not apply (or use) in estuarine oil fields where drilling fluids (muds) are discharged in the surface water. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. GARRATT-CALLAHAN FORMULA 35 will control algae and bacterial slimes found in recirculating cooling tower water. GARRATT-CALLAHAN FORMULA 35 helps clean and loosen slime debris from cooling system surfaces. When used in slug doses, no other microbicide is required. GARRATT-CALLAHAN FORMULA 35 is economical to use because it is concentrated. It must be handled with care. To control algae and bacterial slimes, use GARRATT-CALLAHAN FORMULA 35 as directed. For best results, slug feed. The frequency of addition of microbicide needed depends on many factors. To optimize your use of GARRATT-CALLAHAN FORMULA 35, follow this procedure.

- Initially use 12 fluid ounces per 1000 gallons of water to be treated (20ppm active quatarnary). Should the above dosage not give satisfactory results, use 18 fluid ounces per 1000 gallons of water. Repeat the initial dose every seven days or increase the frequency if needed.
- When the above treatment level is successful, use 4 to 6 fluid ounces per 1000 gallons of water to maximize efficiency. Repeat weekly as needed. Should slime develop again, go back to initial dosage.

Cooling tower waters that are inherently low in growth and bacteria count may be adequately controlled by the lower range of these dosages fed every seven days. Dilute the appropriate amount of GARRATT-CALLAHAN FORMULA 35 in 1 or 2 gallons of water then add to the sump of the tower.

Should tower be heavily fouled, a precleaning is required.

ACCEPTED
with COMMENTS
in EPA Letter Dated:
DEC 17 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 8540-13

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Avoid freezing, excessive heat or exposure to light, especially direct sunlight. Store in a cool, well ventilated location. If heating is necessary to prevent freezing, care must be taken to prevent overheating. Average product temperature should be maintained below 110°F. Temperature monitoring is recommended. Drums should be opened in well-ventilated areas. Leaking or damaged drums should be placed in overpack drums for management. Spills must be absorbed and properly disposed.

PESTICIDE DISPOSAL: Pesticide wastes may be hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for Guidance.

CONTAINER HANDLING:

NONREFILLABLE CONTAINER (Less than or equal to 5 gallon container):
Do not reuse or refill this container.
RESIDUE REMOVAL: Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available.

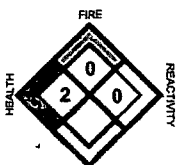
NONREFILLABLE CONTAINER (Greater than 5 gallon container):
Do not reuse or refill this container.
RESIDUE REMOVAL: Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat procedure two more times. Then offer for recycling or reconditioning. If not available, puncture and dispose in a sanitary landfill.

EPA REG. NO.	8540-13	
EPA EST. NO.	8540-CA-1	[]
	8540-TX-1	[]
	8540-GA-1	[]
	8540-IL-1	[]
	8540-NJ-1	[]

MANUFACTURED BY GARRATT-CALLAHAN COMPANY

REV 8/26/2010

MADE IN USA



See Side Panel For Additional Precautionary Statements

PRODUCT NO. 0315010
NET WEIGHT 385 LBS. (47 GAL.)

3043